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NOTES OF CASES.

MUNICIPAL CORPORATIONS—LOCAL ASSESSMENTS.—In *Connecticut Mutual Life Ins. Co. v. Chicago* (Ill.), 56 N. E. 1071, it is held that a municipal corporation cannot lay an assessment upon abutting lots to pay for street improvements made before passage of the ordinance authorizing the assessment.

MUTUALITY OF CONTRACTS.—Mutual promises of merchants to refrain from engaging in business after 6:30 P. M. of each day, are held, in *Stovall v. McCutchen & Co.* (Ky.), 47 L. R. A. 287, to be a sufficient consideration to support the contract, and an injunction to enforce it was held proper in order to prevent a repeated and recurring cause of action.

COMPULSORY VACCINATION.—In *State v. Hay*, 35 S. E. 459, the Supreme Court of North Carolina holds that it is within the police power of the State to compel citizens to submit to vaccination, under penalty of fine and imprisonment. The case follows *Morris v. Columbus* (Ga.), 30 S. E. 850, 42 L. R. A. 175, and *Blue v. Beach* (Ind.), 56 N. E. 89. See 4 Va. Law Reg. 390.

ATTEMPT TO COMMIT CRIME.—An attempt to break and enter a dwelling house was held, in *People v. Youngs* (Mich.), 47 L. R. A. 108, not to have been made where a person left home with a revolver and slippers, and traveled nine miles toward the place of an intended burglary, there met a confederate, and provided himself with chloroform and loaded his revolver, but was prevented from committing the crime by being arrested.

GAME LAWS—IMPORTATION FROM ANOTHER STATE.—The possession within the State for the purposes of sale, of trout lawfully caught in another State, is held, in *State v. Schuman* (Or.), 47 L. R. A. 153, to be subject to a State statute making it unlawful to sell, offer for sale, or have in possession for sale, any species of trout at any time, without reserving any open season or making any saving clause under which trout may be sold.

GARNISHMENT—EFFECT OF JUDGMENT.—A judgment against a solvent garnishee which the plaintiff fails to collect, without any excuse, is held, in *Bowen v. Port Huron E. & T. Co.* (Iowa), 47 L. R. A. 131, to constitute a satisfaction of the claim against the original debtor for the amount of such judgment. With this case there is a note collecting the other authorities on the effect of a judgment against a garnishee to merge or satisfy the liability of the principal debtor.

MECHANICS' LIENS—NATURE OF IMPROVEMENT CONTEMPLATED.—The right to a mechanic's lien for the improvement of grounds by enrichment of the soil, planting flowers, shrubs, trees, etc., without making any structure thereon, except a rustic bridge of slight importance, is denied in *Nanz v. Cumberland Gap Park Co.* (Tenn.), 47 L. R. A. 273, where the statutes clearly contemplate that such liens shall be created only by the erection of some building.